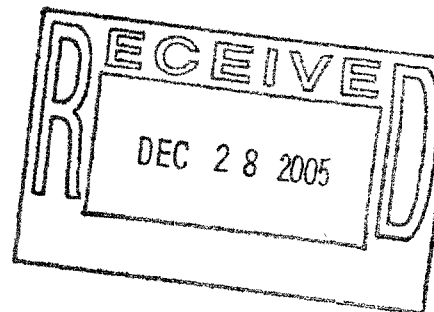




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December 23, 2005

The Office of Nutritional Products, Labeling, and Dietary Supplements  
Division of Nutrition Programs and Labeling (HFS-800)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



**Title: New Product - Food Labeling; Notification Procedures for Statements on Dietary Supplements**

To Whom It May Concern:

We launched a new product in December, 2005. We are going to sell it with the name of Colostrum Joint Care Formula (please refer to the attached label):

The new product has the following ingredients:

- |  |                 |
|--|-----------------|
| 1. Colostrum (New Zealand)   | 591 mg / V-caps |
| 2. Proprietary Enzymes<br>(Amylase, Glucoamylase, Invertase,<br>Malt Diastase and Cellulase) | 59 mg / V-caps  |
| 3. Cetyl Myristoleate  | 100 mg / V-caps |
| 4. Lipase  | 50 mg / V-caps  |
| 5. Glucosamine Sulfate 2KCl  | 100 mg / V-caps |
| 6. MSM (Methyl Sulfonyl Methane)   | 100 mg / V-caps |

The main ingredients of the product are glucosamine, MSM and cetyl myristoleate. These three ingredients are widely used in the U. S. dietary supplements. Many published articles suggest that the above three ingredients might potentially help maintain joint health (please refer to the attached research articles). In addition, our proprietary enzymes may enhance colostrums immunoglobulin absorption (please refer to the article written by Dr. Medhekar at NEC (National Enzyme Company, our enzyme supply) in Forsyth, MO).

Here is the list of the attached for more information.

1. The New Product Label
2. Published Article about the efficacy of glucosamine
3. Published Article about the efficacy of MSM
4. Published Article about the efficacy of cetyl myristoleate

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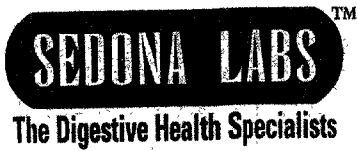
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www.sedonalabs.com



5. Article about the effect of enzyme blend on colostrums absorption

I certify that all of the information and the attached data presented in this notice are accurate and truthful. If I can be of any assistance, please contact me at [mokang@sedonalabs.com](mailto:mokang@sedonalabs.com) or 1-800-914-6311.

Sincerely yours,

Mo Kang, MBA, MS  
Senior Scientist  
New Product Development Department  
Sedona Laboratories, Inc.

cc: W. Nist